

UNITED STATES DISTRICT COURT  
FOR THE  
DISTRICT OF MASSACHUSETTS

SONYA LARSON

Plaintiff,

v.

DAWN DORLAND PERRY et al.,

Defendants.

Civil Action No.

C. A. No.: 1:19-CV-10203-IT

JOINT MOTION FOR EXTENSION TO DEADLINE FOR FURTHER  
SCHEDULING PROPOSALS

The parties jointly move the Court for an extension to the deadline set to submit a proposal for the deadlines to (a) complete fact discovery, specifically, the depositions of the parties to this litigation, and (b) submit a statement to the Court concerning the parties' view on mediation. In support of this motion, the parties state as follows:

1. The parties appeared before this Court for a case management conference on April 5, 2021.
2. At that conference, two motions to compel were referred to Magistrate Judge Bowler, and an order was entered that one week after a ruling was entered on said motions, counsel was to enter a joint proposed schedule for remaining depositions, as well as any request for a referral to ADR.

3. A hearing on the motions to compel was held on May 14, 2021 and May 17, 2021. A ruling was entered on May 18, 2021, in accordance with rulings made on the record in open court.

4. As reflected in open court, the rulings included instructions for the parties to meet and confer concerning further productions and other discovery.

5. The parties met and conferred concerning further productions and other discovery on May 21, 2021. Consistent with representations made during the court hearings, the parties agreed that Plaintiff Sonya Larson would produce outstanding documents on or before June 4, 2021, and that Defendant Dawn Dorland would supplement interrogatories within two weeks after that date.

6. On June 4, 2021, Plaintiff Sonya Larson mailed a document production to the other parties, which were received the following week. Ms. Dorland's supplemental discovery is not yet due.

7. Ms. Dorland is still in the process of reviewing the supplemental production, and has yet to determine whether the production is complete.

8. In light of the as yet unmet deadlines and potential required follow up, the parties are unable as of yet to schedule depositions.

WHEREFORE, in light of the foregoing, the parties request an additional three (3) weeks, until July 5, 2021, to submit a proposed deposition schedule and updated statement concerning ADR.

RESPECTFULLY SUBMITTED,

SONYA LARSON,  
By her attorney,

/s/ Andrew D. Epstein

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